

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

American Stair Corporation  
Attn: Robert Edwards  
642 Forestwood Drive  
Romeoville, Illinois 60446

Application No.: 99050076

I.D. No.: 197090AAZ

Applicant's Designation:

Date Received: August 13, 2004

Subject: Metal Products Manufacturing

Date Issued: November 4, 2004

Expiration Date: November 4, 2009

Location: 642 Forestwood Drive, Romeoville

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a spray booth coating operation, pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for any single HAP and 25 tons/year for combination of HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Emissions of volatile organic material (VOM) including clean-up operations from the coating operation shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Per/Month)</u>	<u>(Per/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
VOM*	2.5 Tons	24.5 Tons	2.5	24.5

\* VOM usage shall be calculated using the equation in Condition 5(c).

These limits define the potential emissions of VOM and are based on maximum usages, maximum VOM content and the maximum amount of solvent reclaimed and shipped off-site as provided in the application. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

3. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
4. Pursuant to 35 Ill. Adm. Code 218.204(j)(2), any coatings including primers applied at any time in the coating operation shall not exceed 3.5 lb VOM per volume (gal) of coating (minus water and any other compounds which are specifically exempted from the definition of VOM) as applied at each applicator and shall be air dried.

5. The Permittee shall maintain monthly records of the following items:
  - a. Amount of each coating (primer) and solvent used in the coating operation (tons/month and tons/year) or (gal/month and gal/year).
  - b. VOM and HAP content of each coating (primer) and solvent used in the coating operation (percent weight) or (lb/gal).
  - c. Calculations of VOM and HAP usage for the spray paint booth. The following equation shall be used to calculate usage:

$$Te = \left[ \sum_{i=1}^n AiBi \right] - \text{Solvent and / or HAPs Re claimed and Shipped Off - Site / Mo}$$

Where:

Te = Usage in units of lb/mo;

n = Number of different coatings used each month;

i = Subscript denoting an individual coating;

Ai = Weight of VOM and HAPs per volume of each coating used each month in units of lbs/gal or weight percent of each coating used each month (% weight); and

Bi = Amount of each coating used each month in units of gal/month or lb/month.

- d. Detailed calculations of plantwide VOM and HAP emissions.
6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
  - a. Amount of each primer and solvent used in the coating operation (tons/month and tons/year).

It should be noted that the gas fired furnace, air make-up unit, space heater, welding, grit blasting and 2 cold batch degreasers are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(d), (y), (aa), and (oo), respectively.

It should be noted that this permit has been revised to incorporate the Construction Permit #01030017 for a replacement spray paint booth and to revise the emission limits for the coating operation.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from metal products manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons per year of VOM and HAPs, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>VOM</u> <u>(Tons/Year)</u>	<u>Combined HAPs</u> <u>(Tons/Year)</u>	<u>Single HAPs</u> <u>(Tons/Year)</u>
24.5	< 25	< 10

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